



Apex Fitness Group™
100 Camino Ruiz
Camarillo, CA 93012

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September 28, 2005

Rec'd
10/17/05

Food and Drug Administration
Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
200 C Street SW
Washington, DC 20204

Dear Sirs:

Notice is hereby given pursuant to Section 403 (r)(6)(21 U.S.C. 343(r)(6)) of the Federal Food Drug and Cosmetic Act that Apex Fitness Group, 100 Camino Ruiz, Camarillo, CA 93012 has marketed a dietary supplement under Apex Fitness Group Fit Advanced "Calcium " bearing the following statement(s) on the label and/or in the labeling:

(Statement 1) Maintain bone health (with vitamin D & magnesium)

(Statement 2) "This formula contains calcium and magnesium, which are used by the body to maintain bone and normal muscle and nerve activity. The magnesium contained in this product also assists in better calcium homeostasis. This product's Advanced Delivery System is designed to provide more effective mineral absorption. In addition to regular exercise and a healthy diet, this formula may reduce the risk of osteoporosis, which is prevalent in Asian and Caucasian postmenopausal women".

The undersigned certifies that the information contained in this notice is complete and accurate and that Apex Fitness Group has substantiation that the statement(s) is truthful and not misleading. Pursuant to 101.93 (a)(1), two copies of this notification are enclosed.

Respectfully,

Jim Starr
Director Product Development
Apex Fitness Group
100 Camino Ruiz
Camarillo, Ca. 93012

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This formula contains calcium and magnesium, which are used by the body to maintain bone health and normal muscle and nerve activity. The magnesium contained in this product also assists in better calcium homeostasis. This product's Advanced Delivery System is designed to provide more effective mineral absorption. In addition to regular exercise and a healthy diet, this formula may reduce the risk of osteoporosis, which is prevalent in Asian and Caucasian post-menopausal women.*

DO NOT USE IF SAFETY SEAL UNDER CAP IS BROKEN OR MISSING.

KEEP OUT OF REACH OF CHILDREN.

Suggested Use: As a dietary supplement, take 1 or 2 tablets daily with 8 oz of water. As a general rule, these minerals are best taken with meals. Some individuals may wish to take a dose at bedtime to provide nutritional support for tense muscles.*

Does not contain sugar, salt, starch, yeast, artificial coloring, flavoring or preservatives.
Keep in a cool, dry place. Do not refrigerate.
Utilizes a natural protective coating.

* These statements have not been evaluated by the FDA. This product is not intended to diagnose, treat, cure or prevent disease.



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Manufactured by Phoenix Laboratories
Exclusively for Apex Fitness Group™
100 Camino Ruiz, Camarillo, CA 93012
www.apexfitness.com

ADVANCED CALCIUM

apex

FIT

MAINTAIN BONE HEALTH*
(WITH VITAMIN D & MAGNESIUM)

tablets
120

natural dietary supplement

Supplement Facts

Serving Size: 2 Tablets
Servings Per Container: 60

Serving	% Daily Value
Elemental Calcium	1000 mg 100%
Vitamin D	200 IU 50%
Elemental Magnesium	500 mg 125%

Other Ingredients: Microcrystalline Cellulose, Vegetable Stearate, Croscarmellose, Magnesium Stearate.

